

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

CHARITY CHIDINMA  
EMERONYE SWIFT,

Plaintiff,

V.

FRONTIER AIRLINES, INC., et. al.

Defendants.

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) Case No: **1:14-CV-001139**

**MEMORANDUM IN SUPPORT OF EXPEDITED**  
**MOTION TO WITHDRAW AS COUNSEL**

Geoffrey S. Burke and Douglas M. Coleman (collectively “Movants”)

respectfully move to withdraw as counsel of record herein on behalf of Plaintiff Charity Chidinma Emeronye Swift and submit this memorandum in support of their motion for leave to withdraw as counsel pursuant to Local Rules of Civil Procedure 7 and 83.1(G) state as follows:

Plaintiff is dissatisfied with Movants and will now endeavor to retain new counsel or, in the alternative, proceed as a *pro se* Plaintiff. Accordingly, the Movants provided reasonable notice to Plaintiff of their intent to request leave from this Court to withdraw as counsel and have advised Plaintiff to retain new counsel to make an appearance in this litigation. Counsel for Defendant Frontier Airlines does not object to Movants withdrawal as counsel for the Plaintiff.

Expedited handling of the Motion to Withdraw as Counsel is requested because of the impending November 20, 2014, deadline for Plaintiff to respond to Defendant's Motion to Dismiss. Movants request that the Court stay all proceedings to provide Plaintiff ten

(10) days to retain new counsel which will, in turn, extend the deadline for Plaintiff to file the response to Defendant's Motion to Dismiss until December 5, 2014.

Movants' withdrawal is permitted under Rule 1.16(b) of the Virginia Rules of Professional Conduct. It is clear that Movants' withdrawal can be accomplished without impeding the administration of justice, efficiency, or functions of this Court. In fact, no injustice will befall the Plaintiff because a trial date has not yet been set and discovery has not commenced.

A proposed Order is submitted herewith and Movants waive a hearing on this matter.

WHEREFORE, Movants respectfully request that this Court grant their Motion on an expedited basis and provide leave for Movants to withdraw as counsel in this litigation.

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_  
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-and-

\_\_\_\_\_/s/\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of November 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Sarah E. Moffett (VA Bar No. 72209  
LeClairRyan, a Professional Corporation  
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-and-

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**Attorneys for Frontier Airlines, Inc.**

I further certify that a copy of the foregoing motion was mailed on the 19<sup>th</sup> of November 2014 to:

Charity Swift  
2121 Eisenhower Avenue, Suite 200  
Alexandria, Virginia 22314-4688

\_\_\_\_\_/s/\_\_\_\_\_  
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